GENERAL PLAN

L1-49 (48) The County's General Plan "*Land Use Element*", "*Agricultural Element*", "*Water Element*" and "*Conservation/Open Space Element*" and their policies, goals and objectives as well as the Land Use Ordinance are directly applicable to any water transfers potentially impacting agriculture, water and the unique natural resources in Imperial County for the next 75 years. The Draft EIR/EIS fails to adequately address applicable sections of the County's General Plan and Land Use Ordinance which will be affected by the proposed water transfer and should address and mitigate these inconsistencies.

L1-50 (49) In Section 3.4.2.3 Local Regulations and Standards (under Section 3.4 "Land Use" of the Draft EIR/EIS), mentions the Imperial County General Plan and includes the nine land use classifications in the *Land Use Element*. The draft document does not include in its analysis the affected portions of the County Land Use Ordinance regulations relating to water, including: Division 16, Flood Damage Prevention, Division 21, Water Well Regulations and Division 22, Groundwater Ordinance. Considering the fact that this is a water transfer, the most important aspect to be addressed would have to be how the transfer affects water policies contained in the General Plan.

L1-51 The inconsistencies with regard to the Draft EIR/EIS and the County's Land Use Ordinance and General Plan also lie in the document's discussion of fallowing. The County's General Plan does not envision the "permanent fallowing of agricultural land" whether it is conserved for use within Imperial Valley or transferred outside the County.

L1-52 (50) Section 3.4.4.3 of the Draft EIR/EIS (page 3.4-13), states, "Regardless of the specific fallowing method, no land use impacts would occur because the Proposed Project would not change agricultural zoning and, therefore, it would not conflict with an adopted, land use plan". This is statement is not only inaccurate but is also inconsistent with the County's General Plan and their elements, policies, goals and objectives, while the "zone" would not change certainly the use would and this needs to be clarified.

(51) In the future, these "fallowed" agricultural lands then could then be asked to be taken out of the agricultural "land use classification" and designated under other land use categories, such as Urban, Rural Residential, Recreation/Open Space, and/or a Specific Plan Area.

L1-53 (52) Another argument with regard to incomplete analysis of Imperial County's Land Use Ordinance and General Plan is that there is a very real possibility that the IID/SDCWA water transfer and future transfers will reduce the Salton Sea, therefore expose lands currently lying underwater. The County's objective for the "-220 contour" in the *Conservation/Open Space Element* provides as follows:

> "...Objective 8.3 Regulate development in or adjacent to water bodies and courses, protect water bodies and minimize property damage. Zone the areas

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Response to Comment L1-49

The Lead Agencies acknowledge that elements of the County's General Plan include policies, goals, and objectives relating to, among other things, use of agricultural lands, water use and conservation, conservation of biological resources, and open space objectives. The comments from the County indicate that its primary concerns are the impact of the Proposed Project on agricultural production and retention of agricultural lands and its objection to the fallowing of agricultural lands.

The Draft EIR/EIS explains that, as originally envisioned, the Water Conservation and Transfer Project did not anticipate the use of fallowing as a conservation measure. Section 2.2.3.4 of the Draft EIR/EIS describes certain restrictions on fallowing contained in the IID/SDCWA Transfer Agreement and IID Board policies stating that the Board is not in favor of the use of fallowing in connection with the Proposed Project. However, as a result of the environmental review process and consultation with federal and state regulatory and resource agencies, fallowing has been suggested as a means of reducing the impacts of the water conservation program on certain resources, including the Salton Sea and air quality. In order to comply with the requirements of CEQA, the EIR/EIS must evaluate conservation methods which have the potential to reduce the significant effects of the Proposed Project, whether these are considered mitigation measures, project alternatives, or changes in the Project. The EIR/EIS recognizes that if long-term or permanent fallowing results in the conversion of agricultural lands to non-agricultural use, the impact to agricultural resources is significant.

As suggested by the County, this response to its request for an analysis of consistency with the General Plan focuses on the following elements of the General Plan: Land Use, Agricultural, Water, and Conservation/Open Space. The General Plan states that the purpose of these elements is to identify general goals, policies, and standards, which serve as primary policy statements for implementing development policies and land uses; they do not typically force specific actions. For example, the Land Use Element [page 35] states that the goals and objectives are "policy statements representing ideals which have been determined by the citizens as being desirable and deserving of community time and resources to achieve," which should be used as guidelines but not doctrines [page 35].

The Water Element [page 25] states:

"The goals and objectives are not to be inclusive and are general in nature. They are not to be considered as a means to regulate a specific area. The main intent is for them to be implemented only to the extent that such implementation is achieved by reasonable regulations or rights therein. The goals and objectives may change at any time to accommodate appropriate growth within the county."

The General Plan states numerous goals and policies which, when applied to the features of the Project, are mutually inconsistent. For example, the General Plan includes policies:

- To preserve commercial agriculture as a prime economic force.
- To encourage the continuation of irrigation agriculture on Important Farmland.
- To allow conversion of agricultural land to non-agricultural uses only where a clear and immediate need can be demonstrated.

The Agricultural Element [pages 5-7] recognizes the extensive acreage within Imperial County that is suitable for agricultural production, describes "the long-term commitment by the County to the full promotion, management, use, and development and protection of agricultural production," and recognizes agriculture as the "single most important economic activity of Imperial County."

Long-term or permanent fallowing by itself would not advance the objectives described above. As discussed above, however, the impetus for considering fallowing as a conservation measure is to reduce the environmental impacts of other conservation measures. This purpose is consistent with other policies and objectives set forth in the General Plan which encourage conservation and protection of environmental resources, such as:

- To identify and preserve the County's air and water quality.
- To preserve as open space those lands containing important natural resources, sensitive vegetation, and wildlife habitats.
- To establish policies and programs for maintaining salinity levels in the Salton Sea which enable it to remain a viable fish and wildlife habitat.
- To encourage farmers to use irrigation methods that conserve water.
- To improve the quality of irrigation water runoff to minimize impacts to downstream water bodies, wetland habitats, and the overall environment.
- To encourage water conservation by promoting the development of structural and non-structural measures, including improved on-farm irrigation water management systems.
- To use open space easements to protect natural resources and the public health and safety, including areas required for the preservation of a habitat for fish and wildlife species, areas required for the protection of water quality, and areas required for the protection and enhancement of air quality.
- To cooperate and coordinate the use of water resources to protect and enhance valuable wildlife communities and habitats of the region.

. . .

The Water Element recognizes the difficulties involved in balancing agricultural production and environmental protection. This element [pages 27-28] acknowledges:

- Environmental concerns regarding the Salton Sea, particularly increased salinity and selenium levels, stating: "The solution to increased salinity and selenium levels is not simply to reduce irrigation water, since this would actually be accompanied by a rise in salinity and selenium concentrations. Nevertheless, it behooves the agricultural community to remain sensitive to and cooperate with environmental efforts to stabilize salinity and selenium of the Salton Sea."
- That more federal and state regulation of agriculture is likely in the future and that the agricultural community needs to be concerned with environmental issues, concluding: "The agricultural community needs to anticipate and take the lead on environmental protections before governments do it for them."

. . .

The Water Element recognizes that water is a key resource critical to the preservation of agricultural production, but it also specifically acknowledges growing concerns about water resources and environmental problems and that water in California is becoming a scarce resource. It describes the extensive water conservation efforts initiated by IID, including the 1988 IID/MWD Agreement, which funded specific conservation facilities. It recognizes "the possible reduction of available Colorado River water caused by increased demand and adverse climactic conditions, as well as the balancing of urban and agricultural needs with those of plants and wildlife." Thus, the Project advances certain General Plan goals and objectives and does not advance others. The consistency or inconsistency of the Project with the General Plan is not clear without some guidance on the relative importance of various goals and objectives, which the General Plan does not provide. The Project raises difficult issues regarding how a limited supply of Colorado River water should be applied among competing beneficial uses. The IID Board must consider the assessment contained in the Final EIR/EIS and determine, in compliance with CEQA, whether the Project should proceed and how the Project objectives and environmental impacts should be appropriately balanced. Through the County's comment letter and this response, the Final EIR/EIS will identify the County's issues and concerns, and the IID Board must consider this information in deciding what action to take on the Project.

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Response to Comment L1-50

See response to Comment L1-49.

Response to Comment L1-51

We acknowledge that the General Plan does not encourage permanent fallowing. Please also see the response to Comment L1-49.

Response to Comment L1-52

As discussed above, the County General Plan states policies, goals and objectives to guide land use decisions by the County. The Draft EIR/EIS indicates that no specific land use approval by the County is anticipated or required in connection with the Project. The Project does not impair or impede Imperial County's discretionary right to review and approve any application for the rezoning of agricultural land. Neither the IID Board nor Reclamation has the authority to change the General Plan land use designation or the zoning for property within Imperial County. With respect to the effect of fallowing, the Draft EIR/EIS indicates that any long-term or permanent fallowing that results in the conversion of agricultural land to non-agricultural use is significant, whether or not a zone change is involved. The impacts of fallowing on the local economy are described in the Socioeconomics section 3.14 of the Draft EIR/EIS.

Response to Comment L1-53

The Conservation/Open Space Element of the General Plan includes the objective cited by the commenter. The purpose of rezoning areas below elevation -220 as open space, as stated in the General Plan, is to minimize property damage from fluctuating Sea elevations. The Proposed Project is not anticipated to have a significant impact in terms of flooding private property around the Salton Sea. In fact, reduced inflows projected for the Proposed Project will reduce the potential for flooding. The use of fallowing as a conservation measure, to which the County objects, will minimize inflow reductions. If the County decides to require rezoning for property protection or other reasons, this would be consistent with the General Plan objective, rather than inconsistent with it.

The Master Response on *Air Quality—Salton Sea Air Quality Monitoring and Mitigation Plan* in Section 3 includes discussion of how it may be appropriate to limit access to the area around the Salton Sea to prevent the disturbance of exposed soils. The HCP also proposes certain habitat enhancement activities around the Salton Sea. The Conservation/Open Space Element anticipates the use of open space easements for such purposes, described as either 'the preservation of natural resources' or 'the protection of the public health and safety.' IID has no current plans to sell its existing property around the Sea, nor has it decided whether to purchase additional exposed lands. We note that a substantial portion of submerged lands are owned by the Torres-Martinez Indian Tribe and by various state and federal agencies.

around the Salton Sea below elevation -220 feet as open space to minimize property damage from fluctuating sea elevations..."

The reduction of the Sea below the - 220 foot level would require re-zoning of large tracts of land in and surrounding the Sea by the County Board of Supervisors. The Draft EIR/EIS Section 3.4.4.7 (Page 3.4-16, under Alternative 4 of the "Salton Sea") states, "No conflicts with the adopted land use plans would occur as a result of the decline in the Sea's elevation because the proposed project does not include re-zoning of the exposed seabed". The Draft EIR/EIS does not adequately address this concern and possible impact on the County's General Plan and Land Use Ordinance and does not provide mitigation measures to offset these impacts. It also does not clarify whether IID would purchase the now exposed lands or would the IID sell its current ownerships that it has acquired for flood protection reasons?

L1-53

ARCHEOLOGICAL RESOURCES

(53) The Draft EIR/EIS also fails to adequately address the archeological and cultural resources impacts of the water transfer and how this may conflict with what is contained in the County's Land Use Ordinance and General Plan. Section 3.8.3.4 of the Draft EIR/EIS refers to undated archeological and historical information. The County's *Conservation/Open Space Element* of the General Plan was updated in 1993 and identifies approximately 7,000 prehistoric archaeological and recorded sites in the County. Additionally, approximately 200 historic sites, dating back to 1540, have been recorded in the County and Jay von Werlhof's archaeological "Sensitivity Map" should be cited as having been revised as of "May 17, 1993" and should also be corrected on page 3.8-23, referencing the 800 historic sites (including trash dumps) according to Jay von Werlhof.

L1-54

(54) The Final EIR/EIS should address how the water transfer will impact the archeological and cultural resource and should measure these impacts by Jay Von Werlof's archaeological "Sensitivity Map".

L1-55

The Draft EIR/EIS has failed to adequately consider the importance of the Imperial County General Plan. The General Plan is a state-mandated document and has a number of important environmental issues that the Draft EIR/EIS either failed to address or the response was deficient.

L1-56

Response to Comment L1-54

The Draft EIR/EIS addresses archaeological and cultural resources impacts on the water transfer in a programmatic rather than project-specific fashion. Project-specific impact analysis will conform to CEQA regulations (and to any applicable federal regulations) as well as conform with the County's Land Use Ordinance. Section 3.8.3.4 of the Draft EIR/EIS will be currently reflects 800 historic sites. Jay von Werlhof's archaeological sensitivity map will be cited as having been revised as of May 17, 1993. This change will be indicated in subsection 3.8.3.4 under Section 4.2, Text Revisions in this Final EIR/EIS.

Response to Comment L1-55

Since the water conservation program is voluntary, the specific geographical location of where conservation measures would be constructed has not been determined. As noted in the Draft EIR/EIS in Section 2.2.3.1, the conservation program could include a potentially broad and varying range of construction locations to provide maximum flexibility to the IID Board to adopt the program to changing circumstances, methods, and participants over the lengthy Project term. Assumptions were made for modeling purposes that would capture the full range of potential impacts. The impacts of the conservation program ultimately adopted will fall somewhere within this range.
Section 3.8, Cultural Resources, in the Draft EIR/EIS considers impacts to cultural resources from the construction of the conservation measures to be potentially significant. However, the mitigation measures included in the EIR/EIS have been designed to provide assurances in the event that if cultural resources are encountered during Project construction or operation, they will be handled appropriately. With implementation of these mitigation measures, potential impacts to cultural resources are considered less than significant.

While Jay von Werlhof's sensitivity map can be a useful tool in helping agencies identify areas of greater or lesser archaeological sensitivity, attempts to use his sensitivity map to address how the water conservation program will impact archaeological and cultural resources would not be applicable for the purposes of this environmental analysis.

Response to Comment L1-56

See response to Comment L1-49.

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CONCLUSION

In order for the Draft EIR/EIS to serve its purpose of identifying significant impacts and proposed mitigation measures, the Draft EIR/EIS "alternatives" must attempt to reduce impacts to the IID service area and the Salton Sea. However, the Draft EIR/EIS provides that the first and second 50 KAFY components of the Proposed Project could be satisfied by a mixture of conservation measures, including on-farm irrigation system improvements, delivery system improvements, and/or fallowing without verifiable evidence.

The federal and state environmental laws require that a good faith and reasoned analysis be presented to the public and decision-makers for informed determinations and that any subsequent findings must supply the logical step between the ultimate findings of approval or rejection and the facts in the record. Under CEQA, the explanation for the use of "fallowing", permanent or otherwise, must be supported by applicable scientific, explanatory information and empirical authority and any unsupported conclusionary statements will not suffice.

L1-57

The purpose of CEQA is to reduce impacts causes by proposed projects, not to relocate impacts because they may be in the way of a water transfer. It is wrong to assume that more than ninety (90) years of habitat formation in the Imperial Valley can or should be simply re-engineered because it will impede the water transfer. Biological habitats, especially desert habitats, are extremely fragile and must be protected. To assume that these habitats can simply be replaced when they impede progress is not appropriate.

Thank you for the opportunity to respond to the Draft EIR/EIS and we reserve the right to respond to the final environmental document and present any further input at future public hearings.

Response to Comment L1-57

The alternatives to the Proposed Project, Alternatives 1, 2, 3, and 4, could each reduce impacts compared to the Proposed Project, if the Proposed Project is implemented at its maximum level (300 KAFY) using construction of on-farm or system based conservation measures. Because the implementation of conservation measures would be a voluntary program in the IID water service area it is not possible to define the project exactly in terms of what types of conservation measures would be implemented. Therefore, the Proposed Project has been intentionally defined to provide flexibility in the amount of conservation as well as the type and location of conservation methods utilized. However, for impact analysis it was assumed that the greatest amount of conservation, 300 KAFY, would be achieved using the conservation methods that would result in the greatest impacts to the Salton Sea related resources. The Project Alternatives were designed to show how impacts could be reduced with lesser levels of conservation and with exclusive use of methods of conservation. For example, Alternative 2 would result in conservation of 130 KAFY using on-farm conservation only. Alternative 4 demonstrates the impacts of conserving 300 KAFY using fallowing only. This approach meets the intent of both CEQA and NEPA for alternatives analysis.

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If you should have any questions, please feel free to contact me at (760) 482-4236, extension 4310, or by e-mail at jurgheuberger@imperialcounty.net.

Sincerely,

JURG HEUBERGER, AICP
Planning Director

Attachments

cc: Board of Supervisors
Ann K. Capela, County Executive Officer
Ralph Cordova, County Counsel
Joanne L. Yeager, Asst. County Counsel
Darrell Gardner, Assistant Planning Director
Steve Birdsall, Ag. Commissioner/APCO
Randy Rister, I.C. Fish & Game Commission
Jesse Silva, Imperial Irrigation District
Steven A. Pastor, Imperial County Farm Bureau
Antonio Rossmann, Special Counsel
U.S. Bureau of Reclamation, Boulder City
IID/SDCWA Water Transfer File
10.105

JH/rc/jm/thG:/IID Water Transfer/DEIREIS IID Water Transfer letter April 18

ATTACHMENT "A"

L1-58

1. The DEIS should fully evaluate the potential air quality impacts that might result from the long-term water transfer described in the DEIS. The County is concerned that additional emissions that may be generated as a result of the water transfer has the potential to interfere with the attainment of the National Ambient Air Quality Standards (NAAQS) for PM10. Recently, USEPA has issued a determination that Imperial County would be in attainment of the national ambient air quality standards ("NAAQS") for PM10 "but for" transported emissions emanating from Mexico. (66 Fed. Reg. 53106 - October 19, 2001). Thus, the current levels of particulate matter in the air in Imperial County exceed the NAAQS because of particulate matter transported from Mexico. Additional particulate matter generated from within Imperial County as a result of the water transfer could further increase the concentration of particulate matter in the air in Imperial County and jeopardize the "attainment designation" under the Clean Air Act. The DEIS does not correctly describe the attainment status of the Imperial Valley Planning Area, and does not address this important concern.

The PM10 levels are already above the National Ambient Air Quality Standards (NAAQS) in Imperial County. As noted above, the USEPA has determined that Imperial County would be in attainment "but for" emissions being transported from Mexico. If emissions from fallowed lands and newly-exposed shoreline at the Salton Sea result in exceedances of the NAAQS, Imperial County will no longer meet the previously demonstrated criteria for this determination, and will be required to reduce further emissions within Imperial County. This could easily result in new restrictions in the use of off-road areas of the desert, and may also result in other mandated limitations on recreation in Imperial County, and would impose additional restrictions and limitations on agricultural activities. This issue and the potential for additional new regulation should be discussed in the DEIS.

L1-59

2. There are at least two potential additional sources of PM10 as a result of the proposed water transfer: areas of newly-exposed exposed shoreline at the Salton Sea and fallowed farmland that may result from the proposed project. Although the DEIS evaluated both potential sources of emissions, we do not believe that the evaluation in the DEIS was correct or complete. In addition, we are concerned that the listed conservation measures did not sufficiently evaluate conservation methods that would reduce evaporation, rather than simply reduce water use as a whole. The reduction of evaporation is key, as the conservation of water through water use reduction or through reduced drainage exacerbates the recession of the Salton Sea and has the potential to lead to additional dust emissions. Each of these comments is described more fully below.

Response to Comment L1-58

Please refer to the following Master Responses in Section 3 of the Final EIR/EIS: *Air Quality—Salton Sea Air Quality Monitoring and Mitigation Plan, Air Quality—Air Quality Issues Associated with Fallowing*, and *Air Quality—Consistency with the State Implementation Plan for PM10*.

Response to Comment L1-59

Please refer to the Master Responses on *Air Quality—Salton Sea Air Quality Monitoring and Mitigation Plan, Air Quality—Air Quality Issues Associated with Fallowing*, and *Biology—Approach to Salton Sea Habitat Conservation Strategy* in Section 3 of this Final EIR/EIS.

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3. The DEIS on page 3.7-31 states that mitigation measures will reduce the air quality impacts from fallowing to a level of insignificance. However, the DEIS does not address: 1) the monetary cost for mitigation of air quality impacts; 2) the amount of water that mitigation of air quality impacts from fallowed lands will require; 3) how to determine whether mitigation of air quality impacts is effective; or 4) who will ensure that mitigation measures are properly carried out. The DEIS does not provide assurance that the emissions that result from fallowed lands can be mitigated to a level of insignificance. In addition, the DEIS does not provide sufficient information about the mitigation to allow the evaluation of impacts that result from the mitigation.

L1-60

4. The DEIS did not even attempt to quantify emissions that may result from the increased fallowing of lands. Instead, it states on page 3.7-23 that, "it is not possible to quantify emissions and associated impacts from potential increases in fallowing of agricultural lands, at a variety of locations over time, for water conservation. On one hand, emissions would decrease because the fallowed land would not be subject to plowing or the other agricultural activities that disturb soil. On the other hand, fallowed lands that are not properly retired or mitigated may be subject to wind erosion, resulting in fugitive dust impacts." The California Air Resources Board (CARB) has developed methods to estimate the emissions from a variety of farming operations, including emissions from fallowed lands. Although the Imperial County Air Pollution Control District (ICAPCD) has concerns about the applicability of some of the CARB-developed factors in the hot, arid environment of Imperial County, CARB's methods could have been used to at least estimate the potential impacts of fallowing. In addition, these methods could have been used to fix the applicable mitigation measures for the fallowed lands. A more quantitative assessment of the potential emissions from fallowed lands and the proposed mitigation measures is needed in the DEIS.

L1-61

5. Mitigation Measure AQ-3 is described on page 3.7-30 of the DEIS as appropriate for fallowed lands. It states that, "at least one of the following BMPs to minimize PM10 emissions must be implemented. BMPs could include, but are not limited to the following...," followed by a list of vague measures. These measures offer no means of determining when mitigation has been achieved. In addition, although many of these measures require water use, no quantification of additional water use is provided. The listed mitigation measures to assure that fallowed lands are not emissive must be stronger and more detailed and have an enforcement mechanism to ensure that new emissive areas are not created from the water transfer.

L1-62

Response to Comment L1-60

Please refer to the Master Response on *Air Quality—Air Quality Issues Associated with Fallowing* in Section 3 of this Final EIR/EIS.

Response to Comment L1-61

Please refer to the Master Response on *Air Quality—Air Quality Issues Associated with Fallowing* in Section 3 of this Final EIR/EIS.

Response to Comment L1-62

Please refer to the Master Response on *Air Quality—Air Quality Issues Associated with Fallowing* in Section 3 of this Final EIR/EIS.

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L1-63

6. The mitigation measures describe using either "light irrigation" or return water to ensure that sufficient growth is available to stabilize soils. However, the fallowing mitigation must have a monitoring system in place to ensure that the effectiveness of the mitigation measure does not erode over time. In addition, the DEIS does not quantify the water usage that will be required to stabilize fallowed fields. The use of return water will reduce the amount of water available to the Salton Sea. The use of light irrigation will reduce the water otherwise available to Imperial County. This water use must be quantified in either case as it will either reduce the water available for transfer, or will require additional fallowing of fields if the ultimate impact at the Salton Sea is to be mitigated.

L1-64

7. If fields in the area are not fallowed on a fairly short rotational basis, farmland may be permanently removed from use. Due to the high perched groundwater in Imperial County, fields fallowed in Imperial County will degrade as a result of salt seepage from the perched groundwater via capillary effects. This phenomenon, known as "souring," will result in effective destruction of farmlands that have been fallowed for more than about five years. Although soured lands can be put back into service, this practice generally requires the use of soil amendments and water to remove the salts from the land. The DEIS does not assess this impact of long-term fallowing.

L1-65

8. Salt that seeps to the surface along with the groundwater may have the effect of increasing the instability of the lands, and making the surface less stable and more emissive over time. It may also make the restabilization of the fallowed farmland more difficult in successive years, as grasses will be less amenable to growing in soured land. The potential of long-term stabilization of fallowed lands has not been assessed in the DEIS.

L1-66

9. The DEIS describes a strategy that relies on both conservation methods and fallowing to provide sufficient water for the water transfer. However, the conservation methods listed reduce seepage rather than evaporation. Methods that simply reduce seepage ultimately impact the Salton Sea, and a fraction of the water conserved through this method must be returned to the Salton Sea if further recession is to be prevented. However, conservation methods that target the reduction of evaporation, rather than the reduction of seepage, allow the entire saved water to be used in water transfer. The DEIR should evaluate whether there are available conservation measures that would act mostly to reduce evaporation and not seepage. This approach would protect the Salton Sea, and may also prevent additional fallowing of farmland. Even though such measures may be more expensive, they may be worthwhile in reducing the further need to fallow land to allow for the full water transfer.

Response to Comment L1-63

Please refer to the Master Response on *Air Quality—Air Quality Issues Associated with Fallowing* in Section 3 of this Final EIR/EIS.

Response to Comment L1-64

Tile drainage lines are normally placed at depths of 5 to 7 feet below the land surface and maintain the groundwater level at that depth, even in areas with high water tables or poor natural drainage. For all Imperial Valley soils, that depth is sufficient to prevent groundwater, and any salt it may carry, from seeping to the surface. Therefore, should the water conservation and transfer program include a rotational fallowing component, groundwater will not impact the stability of the soil surface, nor will the land "sour" due to excessive salt build-up.

Should the water conservation program include a non-rotational fallowing component (fallowing land for more than 4 years), there is potential for limited surface salinization on low-lying clay soils with poor natural drainage. These soils are located in areas where, in the absence of a functioning tile drainage system, the water table may rise close enough to the soil surface to allow capillary action to induce surface salinization. However, this impact will be avoided by maintaining the subsurface tile drainage system in working order. Should the water conservation program include a non-rotational fallowing component, and should low-lying clay soils with poor natural drainage be included among the lands retired, IID will require the land owner to maintain the subsurface tile drainage system in working order.

Response to Comment L1-65

Water users within IID use water diverted from the Colorado River to irrigate crop land. On average, Colorado River water contains approximately one ton of salt per acre-foot of water. As crops transpire water, the salt remains in the soil. In order to maintain the productivity of the land, the accumulated salts must be leached from the root zone. IID water users apply a small amount of additional leach water to carry accumulated salts below the crop root zone. Approximately 96 percent of farmed fields within the IID water surface area are underlain by tile drainage lines. These tile drainage lines collect the leach water and dissolved salts and convey them to the IID drainage system.

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Response to Comment L1-65 (continued)

Tile lines are normally placed at depths of 5 to 7 feet below the land surface and maintain the groundwater level at that depth, even in areas with high water tables or poor natural drainage. For all Imperial Valley soils, that depth is sufficient to prevent groundwater, and any salt it may carry, from seeping to the surface. Therefore, should the water conservation and transfer program ultimately include a rotational or short-term fallowing component, groundwater will not impact the stability of the soil surface, nor will the land "sour" due to excessive salt build up. Should the Project include a rotational or short-term fallowing component, participating landowners will be required to control wind-induced soil erosion. During the normal course of their farming operations, IID water users employ soil erosion control best management practices (BMPs). For a list of wind erosion control BMPs, consult the National Resource Conservation Service (NRCS) Soil Conservation Field Book. Please refer to the Master Response on *Air Quality—Air Quality Issues Associated with Fallowing* in Section 3 of this Final EIR/EIS.

Should the Project include a land retirement component, there is potential for limited surface salinization on low-lying clay soils with poor natural drainage. These soils are located in areas where, in the absence of a functioning tile drainage system, the water table may rise close enough to the soil surface to allow capillary action to induce surface salinization. However, this impact will be avoided by maintaining the subsurface tile drainage system in working order. Should the water conservation and transfer program ultimately include a land retirement component, and should low-lying clay soils with poor natural drainage be included among the lands retired, IID will require the landowner to maintain the subsurface tile drainage system in working order.

Should the water conservation and transfer program include a land retirement fallowing component, participating landowners will be required to control wind-induced soil erosion, using appropriate NRCS wind erosion BMPs, until the soil surface naturally stabilizes.

Response to Comment L1-66

The water conservation program, which is part of the Proposed Project, includes a range of on-farm, water delivery system, and fallowing conservation measures. The list of conservation measures included in the Draft EIR/EIS is based on available technology, implementation feasibility, and historical conservation practices in the Imperial Valley. The list, however, is not meant to preclude the use of other feasible conservation measures, including measures that target water conservation by reducing evaporation.